
MOWO Privacy Policy

Below is described the Privacy Policy for MOWO Mobile Workflow Management service and mobile application (later "MOWO", "Service"). In this document MOWO means a web browser based web application and a mobile application that is available for download for Android and iOS operating systems.

The party that has made a service agreement (later "Service Agreement") with Observis Oy Ltd acts as a personal information controller (later "Data Controller"). This party can be a company, business, organization etc. Observis Oy Ltd processes personal information (later "Data Processor", "we") on behalf of the Data Controller. Personal information is given by a natural person, who registers to the MOWO service (later "Data Subject") as a user. We also process personal information given by the Data Controller about the Data Subjects according to this privacy policy. We act as Data Controller only in those respects that we define as the means and purposes of processing personal information.

Parties of the Service, their roles and responsibilities regarding data protection

We are the Service provider and Data Processor for personal information. Our client has ordered the right to use the Service and acts as a Data Controller, who enables you to use this Service. Data Controller has made a service agreement in which details about availability, delivery, rights of use and processing of personal information groups as described in this privacy policy. Data Controller has the option to input your personal information on your behalf to the Service. This makes you a registered user and a **Data Subject**. You are a registered user and a Data Subject also when you give your personal information to the Service.

As a **Data Processor** we implement the proper technical and administrative procedures which ensure that the processing of personal information in the Service meets the demands of the valid data protection regulations and Service Agreement. We do not process or otherwise take advantage of the personal information in the Service other than what is agreed in the Service Agreement. Inquiries regarding personal information are primarily Data Controller's, or Data Controller's contact person's responsibility. We help Data Controller to implement your rights as a Data Subject and in accordance with the Service Agreement. We also ensure that other parties acting on our behalf comply with the data protection regulations. **Data Processor** among other things:

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- Processes personal information only to provide the Service to the extent that is necessary to fulfill the Service Agreement and only for the duration of the Service Agreement unless legislation otherwise defines;
 - Processes personal information in accordance with the law, in careful manner and in accordance with good data processing manners and otherwise acts so that the privacy of the Data Subjects are secured and other rights protected by the privacy policy are not limited without legislative justification;
 - Ensures that the persons who have access to personal information process the information only according to the documented, legal and reasonable instructions by the Data Controller, unless the applicable law otherwise demands;
 - Ensures that only those persons process personal information whose work demands it and that those persons are committed to the duty of secrecy or that they are bound by the legal duty of secrecy;
 - Implements all the security procedures enforcing Data Controllers by the law;
 - Helps by all means necessary and considering the nature of processing Data Controller to fulfill its duty in responding to inquiries regarding the use of the rights of the Data Subjects;
 - Takes into consideration requests for data corrections, removals and modifications without unnecessary delay in processing personal information;
 - Either destroys or returns to the Data Controller according to Data Controller's choice and instructions all personal information and deletes existing copies when the Service Agreement ends or during it, unless otherwise stated in the legislation;
 - Maintains necessary descriptions and bookkeeping about the processing activities and makes it available for the Data Controller to acquire all such information that proof that the Data Processor complies with the duties set in the Service Agreement and applicable legislation;

Data Controller informs and guides you in using the Service and at the same time implements its procedures regarding the processing of personal information and data protection. Data Controller is committed to act according to the data protection regulations in the Service. **Data Controller** among other things:

- Is responsible for collecting the personal information
- Processes personal information in accordance with the law, in careful manner and in accordance with good data processing manners and otherwise acts so that the privacy of the Data Subjects are secured and other rights protected by the privacy policy are not limited without legislative justification;

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- Defines the means and purposes of processing personal information and gives Data Processor literal instructions about processing personal information;
 - Ensures that the Data Subjects are given all notifications and information regarding processing of personal information, as bound by law;
 - Ensures that the rights of the Data Subjects are fulfilled;
 - Ensures that the transfer of personal information to the Data Processor and the processing of personal information according to the Service Agreement is in accordance with the law for the whole duration of the Service Agreement;
 - Is responsible for making sure that the processing of personal information in the Service Agreement is in accordance with the legislation, including information security;
 - Confirms that all the necessary information has been given to the Data Processor so that the Data Processor can fulfill all the demands of data protection legislation in the Service Agreement;
 - Is responsible for making sure that all corrections, deletions and amendments in personal information are delivered to the Data Processor without delays.

Personal information that we process

We process in the Service the following personal information groups which consist, among others, of information you have given or the Data Controller has given to us on your behalf:

- Your name
- Your address
- Your phone number
- Your email address
- Your professional skills and qualifications
- Location information

We process the aforementioned personal information groups in order to implement the Service according to the Service Agreement in which you are a party (a Data Subject). We do not execute any kind of automated decision-making towards the Data Subjects in the Service based on the personal information groups above.

Other data processors

We use the Google Firebase service (later “Firebase”) to process the personal information groups mentioned in this privacy policy document. You can read how Google processes personal information in Firebase on our behalf at <https://firebase.google.com/terms/data-processing-terms>.

Google acts as a personal information processor. Google or any other personal information processor has no right to use personal information processed by us to any other purposes than those that are necessary to implement the Service. In Observis Oy Ltd only those employees or subcontractors process personal information who have made a disclosure agreement. Access to personal information is secured with modern technologies and restricted access.

Data retention

We retain and process personal information according to the Service Agreement made with the Data Controller. Once the Service Agreement contract expires or is terminated, we shall return all personal information to the Data Controller or delete retained and processed personal information according to Data Controller’s choice. Data Controller shall inform us within two weeks from the termination of the Service Agreement. Otherwise we delete all processed personal information or alter the data so that the processed Data Subjects cannot be recognized. We may use the altered personal information to develop our products, activities and for analyses, assessment and statistical purposes.

Your rights as a Data Subject

As a Data Subject you have the right:

- to obtain information on the processing of your personal data
- of access to your data
- to rectification of your data
- to the erasure of your data and to be forgotten
- to restrict the processing of your data
- to data portability
- to object to the processing of your data
- not to be subject to a decision based solely on automated processing

To ensure your rights are implemented, primarily contact Data Controller or Data Controller’s named representative. In other cases contact Data Processor’s named data protection officer. You may find data protection officer’s contact information by navigating in our web page www.observis.fi. You may read more about your rights from The Office of the Data Protection Ombudsman’s website [here](#).